

John V. Picone III, Bar No. 187226  
 jpicone@hopkinscarley.com  
 Jeffrey M. Ratinoff, Bar No. 197241  
 jratinoff@hopkinscarley.com  
 Cary Chien, Bar No. 274078  
 cchien@hopkinscarley.com  
 HOPKINS & CARLEY  
 A Law Corporation  
 The Letitia Building  
 70 South First Street  
 San Jose, CA 95113-2406

***mailing address:***

P.O. Box 1469  
 San Jose, CA 95109-1469  
 Telephone: (408) 286-9800  
 Facsimile: (408) 998-4790

Attorneys for Plaintiff  
 NEO4J, INC.

John D. Pernick (Bar No. 155468)  
 jpernick@be-law.com  
 BERGESON, LLP  
 111 North Market Street, Suite 600  
 San Jose, CA 95113  
 Telephone: (408) 291-6200  
 Facsimile: (408) 297-6000

Attorneys for Defendant  
 GRAPH FOUNDATION, INC.

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN JOSE DIVISION

NEO4J, INC., a Delaware corporation,

Plaintiff,

v.

GRAPH FOUNDATION, INC., an Ohio  
 corporation,

Defendant.

CASE NO. 5:19-cv-06226-EJD

**STIPULATION AND [PROPOSED]  
 ORDER TO EXTEND TIME TO FILE  
 REPLY IN SUPPORT OF MOTION TO  
 STRIKE**

Judge: Hon. Edward J. Davila  
 Courtroom 4, 5th Floor

Action Filed: October 1, 2019  
 Trial Date: None

Pursuant to Civ. L.R. 6-2, the parties hereby stipulate to an extension of time for Plaintiff, Neo4j, Inc. (“Neo4j USA”), to file a reply in support of Neo4j USA’s Motion to Strike, but such extension will not affect the Court’s scheduled hearing date.

#### RECITALS

1. On February 7, 2020, Neo4j USA filed its Notice of Motion and Motion to Strike; Memorandum of Points and Authorities in Support thereof (“Motion”). *See* Dkt. No. 32. The hearing on the Motion is currently scheduled for May 7, 2020 at 9:00 a.m.

2. On February 21, 2020, Defendant, Graph Foundation, Inc. (“GFI”) filed a Memorandum of Points and Authorities in Opposition to Plaintiff’s Motion to Strike. *See* Dkt. No. 36.

3. Pursuant to Civ. L.R. 7-3(c), the filing deadline for Neo4j USA to file a reply in support of the Motion is currently February 28, 2020.

4. Neo4j USA has requested and GFI has agreed to grant an extension of time to file its reply from February 28, 2020 to March 3, 2020. The agreed-upon extension corresponds with the deadline for Neo4j USA to file its reply in support of its Motion for a Judgment on the Pleadings that is currently pending in the related case, *Neo4j, Inc. v. Purethink LLC, et al.* (Case No. 5:18-cv-07182).

5. Accordingly, the parties have stipulated and agreed to seek the Court’s approval of, an extension of time for Neo4j USA to file the reply in support of its Motion from February 28, 2020 to March 3, 2020.

6. The parties propose no change in the currently scheduled date for the hearing on the Motion, May 7, 2020, and no prior extension of time for the deadline to file Neo4j’s reply in support of the Motion has been requested.

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**STIPULATION**

Pursuant to Civil Local Rule 6-2, the parties, through their undersigned counsel, hereby stipulate and agree that Neo4j USA's deadline to file a reply brief in support of the Motion to Strike (Dkt. No. 32) should be extended to March 3, 2020. The hearing on the Motion would remain as previously scheduled by the Court on May 7, 2020 at 9:00 a.m.

Dated: February 25, 2020

HOPKINS & CARLEY  
A Law Corporation

By: /s/ Jeffrey M. Ratinoff  
Jeffrey M. Ratinoff  
Attorneys for Plaintiff  
NEO4J, INC.

Dated: February 25, 2020

BERGESON, LLP

By: /s/ John D. Pernick  
John D. Pernick  
Attorneys for Defendant  
GRAPH FOUNDATION, INC.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: \_\_\_\_\_

\_\_\_\_\_  
Hon. Edward J. Davila  
United States District Court Judge

**FILER'S ATTESTATION**

I, Jeffrey M. Ratinoff, am the ECF user whose credentials were utilized in the electronic filing of this document. In accordance with N.D. Cal. Civil Local Rule 5-1(i)(3), I hereby attest that all signatories hereto concur in this filing.

Dated: February 25, 2020

HOPKINS & CARLEY  
A Law Corporation

By: /s/ Jeffrey M. Ratinoff

Jeffrey M. Ratinoff  
Attorneys for Plaintiff and Counter-  
Defendant NEO4J, INC.